

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SIA HENRY, *et al.*, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, *et al.*,

Defendants.

Case No.: 22-cv-00125

Hon. Matthew F. Kennelly

**MOTION TO SEAL PLAINTIFFS' NOVEMBER 22, 2023, OPPOSITION TO  
DEFENDANTS' MOTION TO COMPEL RESPONSES TO DEFENDANTS' SECOND  
SET OF INTERROGATORIES**

Pursuant to the Confidentiality Order in this case (ECF No 254) and Local Rule 26.2, Plaintiffs and Defendants respectfully request that the Court grant this Motion to File Under Seal Plaintiffs' Opposition to Defendants' Motion to Compel Responses to Defendants' Second Set of Interrogatories (Dkt. No. 497). In support of the Motion, the Plaintiffs state as follows:

1. The motion at issue, as well as the accompanying Exhibit A to the declaration of Edward Normand in support of the opposition, discusses, references, and appends certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order.
2. In accordance with Local Rule 26.2(c), the joint status report at issue will continue to be provisionally under seal, but an unredacted version will be provided to counsel and the Court. In addition, a redacted (public) version will be filed via the ECF system within 14 days.

3. Defendants do not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that this Court grant the motion.

Dated: November 22, 2023

Respectfully submitted,

/s/ Robert D. Gilbert

Robert D. Gilbert  
Elpidio Villarreal  
Robert S. Raymar  
David Copeland  
Steven Magnusson  
**GILBERT LITIGATORS & COUNSELORS, P.C.**  
11 Broadway, Suite 615  
New York, NY 10004  
Phone: (646) 448-5269  
rgilbert@gilbertlitigators.com  
pdvillarreal@gilbertlitigators.com  
rraymar@gilbertlitigators.com  
dcopeland@gilbertlitigators.com  
smagnusson@gilbertlitigators.com

/s/ Eric L. Cramer

Eric L. Cramer  
Ellen Noteware  
David Langer  
Jeremy Gradwohl (*phv forthcoming*)  
**BERGER MONTAGUE PC**  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Tel: 215-875-3000  
ecramer@bm.net  
enoteware@bm.net  
dlanger@bm.net  
Jgradwohl@bm.net

Richard Schwartz  
**BERGER MONTAGUE PC**  
1720 W Division  
Chicago, IL 60622  
Tel: 773-257-0255  
rschwartz@bm.net

/s/ Edward J. Normand

Devin “Vel” Freedman  
Edward J. Normand  
Peter Bach-y-Rita  
Richard Cipolla  
**FREEDMAN NORMAND FRIEDLAND LLP**  
99 Park Avenue  
Suite 1910  
New York, NY 10016  
Tel: 646-970-7513  
vel@fnf.law  
tnormand@fnf.law  
pbachyrita@fnf.law  
rcipolla@fnf.law

Ivy Ngo  
**FREEDMAN NORMAND FRIEDLAND LLP**  
1 SE 3d Avenue  
Suite 1240  
Miami, FL 33131  
Tel: 786-924-2900  
ingo@fnf.law

Daniel J. Walker  
Robert E. Litan  
Hope Brinn  
**BERGER MONTAGUE PC**  
2001 Pennsylvania Avenue, NW  
Suite 300  
Washington, DC 20006  
Tel: 202-559-9745  
rlitan@bm.net  
dwalker@bm.net  
hbrinn@bm.net